



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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COMMISSION

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**MEMORANDUM**

**SENSITIVE**

2016 FEB -4 PM 4:18

**TO:** The Commission

**FROM:** Kathleen Guith  
Acting Associate General Counsel for Enforcement

**BY:** Mark Shonkwiler *MS*  
Assistant General Counsel for Enforcement

Allison T. Steinle *AS*  
Attorney

**SUBJECT:** MUR 6817 (If He Votes Like That In Salem Imagine What He Will Do In Congress, *et al.*) – Pre-Probable Cause Conciliation

Attached is a conciliation agreement signed by Carol Russell in her official capacity as treasurer, on behalf of If He Votes Like That In Salem Imagine What He Will Do In Congress ("If He Votes"). See Attach. 1. We recommend that the Commission accept this conciliation agreement to settle If He Votes's violation of 52 U.S.C. § 30104(g), which resulted when If He Votes failed to file the required 48-Hour Independent Expenditure Report for \$51,637 in independent expenditures reported on If He Votes's 2014 12-Day Pre-Primary Report. See Certification, MUR 6817 (Dr. Monica Wehby for U.S. Senate, *et al.*) (Dec. 17, 2015) (finding reason to believe that If He Votes violated 52 U.S.C. § 30104(g) and authorizing pre-probable cause conciliation).<sup>1</sup>

<sup>1</sup> On the same date, the Commission found no reason to believe or dismissed the other allegations in this matter.

Accordingly, we  
believe that the negotiated agreement represents a fair resolution of this matter.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with If He Votes Like That In Salem  
Imagine What He Will Do In Congress and Carol Russell in her official capacity as  
treasurer.
2. Approve the appropriate letters.
3. Close the file.